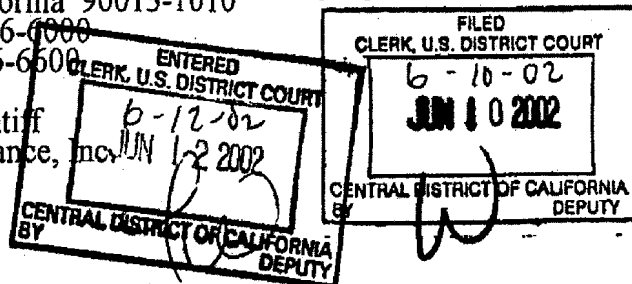


Exhibit E

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8 Attorneys for Plaintiff
 9 Red Mountain Finance, Inc.



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 (close)

10
 11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA

13 Red Mountain Finance, Inc.,
 14 Plaintiff,

15 v.

16 Democratic Republic of Congo and
 17 National Bank of Congo,
 18 Defendants.

Case No. CV 00-0164 R (BQRx)

19 STIPULATION AND ~~PROPOSED~~
 20 ORDER (A) DISMISSING ENTIRE
 21 ACTION WITH PREJUDICE; (B)
 22 RELEASING SUPERSEDEAS BOND;
 23 (C) VACATING DISTRICT COURT
 24 ORDERS ENTERED JANUARY 9,
 25 2001, MAY 30, 2001, OCTOBER 2,
 26 2001 AND DECEMBER 5, 2001; AND
 27 (D) VACATING CLERK'S
 28 ASSIGNMENT.

Hon. Manuel L. Real

This stipulation is made with reference to the following facts:

A. Red Mountain Finance, Inc. ("Red Mountain") has obtained a judgment in this matter against the Democratic Republic of Congo and the National Bank of Congo (collectively, "the DRC");

B. Unocal Corporation ("Unocal") and Unocal International Corporation ("UIC") are not parties to this action, but have been subject to post-judgment proceedings in Red Mountain's effort to collect its judgment;

C. As a result of these post-judgment proceedings, on October 2, 2001 the district court entered an order directing Unocal and UIC to comply with

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 ✓ Copies / NTC Sent
 — JS - 5 / JS - 6
 — JS - 2 / JS - 3
 ✓ CLSD

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1 certain subpoenas, which order Unocal and UIC have appealed to the Ninth Circuit
2 Court of Appeals (appeal no. 01-56774);

3 D. Additionally, on December 5, 2001 the district court entered an
4 order compelling Unocal and UIC to comply with an assignment, which order
5 Unocal and UIC have also appealed to the Ninth Circuit (appeal no. 01-57206); and

6 E. Red Mountain and the DRC have agreed to settle this litigation
7 in accordance with the terms set forth in a separate Settlement Agreement and
8 Release and related documents, the DRC has satisfied Red Mountain's judgment.

9 Based on the foregoing, which is to be considered part of this
10 stipulation, Red Mountain, the DRC and Unocal and UIC hereby agree and stipulate
11 as follows:

12 1. Red Mountain hereby dismisses this entire action with prejudice;

13 2. The DRC, Unocal and UIC have no objection to permitting Red
14 Mountain to dismiss this action with prejudice, and stipulate to the same;

15 3. Red Mountain and the DRC hereby fully release and exonerate
16 Unocal, UIC and their surety from supersedeas bond no. 61S103671723BCM in the
17 amount of \$1,931,896.46 posted on or about December 26, 2001; and

18 4. Red Mountain, the Congo and Unocal and UIC hereby jointly
19 request the district court to vacate the orders entered by the Court in this matter on
20 October 2, 2001 and December 5, 2001. In that regard, this stipulation and order
21 entered thereon, once signed and entered by the Court, are intended to adjudicate
22 once and for all the disputes that gave rise to the district court's orders entered on
23 October 2, 2001 and December 5, 2001 in this matter, as well as the disputes that
24 give rise to Ninth Circuit appeal nos. 01-56774 and 01-57206.

25 5. Red Mountain and Congo agree and stipulate that in light of the
26 settlement referred to in recital E above, that the Court's orders entered January 9,
27 2001 permitting execution on the judgment and May 30, 2001, enjoining certain
28 conduct and directing assignments of certain assets, and the United State's District

1 Court Clerk's Assignment of Assets in this matter, dated July 23, 2001, are no longer
 2 necessary to satisfy the judgment, are now moot and therefore jointly request that
 3 the Court enter an order to that effect.

4 Dated: May 30, 2002

DEWEY BALLANTINE LLP

By: Matthew M. Walsh

Matthew M. Walsh

Attorneys for Unocal Corporation and
 Unocal International Corporation
 SIDLEY AUSTIN BROWN & WOOD

8 Dated: May 30, 2002

By: Scott D. Marcus

Scott D. Marcus

Attorneys for Red Mountain Finance, Inc.

12 Dated: May 30, 2002

RODI POLLOCK PETTKER GALBRAITH & CAHILL

By: Allan Ceran

Allan Ceran

Attorneys for the Democratic Republic of
 Congo and the National Bank of Congo

16 **IT IS HEREBY ORDERED THAT:**

18 1. This stipulation is approved pursuant to Local Rule 7.1;
 19 2. This entire case is hereby dismissed with prejudice;
 20 3. Unocal, UIC and their surety are hereby fully released and
 21 exonerated from their obligations under supersedeas bond no. 61S103671723BCM
 22 in the amount of \$1,931,896.46 posted with the Court on or about December 26,
 23 2001;

24 4. This Court has considered and balanced the competing values of
 25 finality of judgment and right to relitigation of unreviewed disputes, as set forth in
 26 Ringsby Truck Lines, Inc., v. Western Conference of Teamsters, 686 F.2d 720, 722
 27 (9th Cir. 1982), and concludes that this Court's orders entered on January 9, 2001,
 28 May 30, 2001, October 2, 2001 and December 5, 2001 are properly vacated, and

1 hereby VACATES these orders; and that the United State's District Court Clerk's
2 Assignment of Assets in this matter, dated July 23, 2001, is also properly vacated,
3 and hereby VACATES as moot that assignment with the assets assigned thereby
4 reverting to the persons or entity having title to them at the time of the assignment.

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6 Dated: June 10, 2002

By: 

The Hon. Manuel L. Real, JUDGE
UNITED STATES DISTRICT COURT

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